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Attorneys for Chiquita Canyon, LLC,  
Chiquita Canyon, Inc., and Waste  
Connections US, Inc.

**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

ALEJANDRA SUAREZ, an individual,  
JUANA SUAREZ, an individual,  
SEBASTIAN SUKIASYAN, an  
individual, VICTORIA SUMMER, an  
individual, MANJULA SYAL, an  
individual, JUDITH TADENA, an  
individual, ABIGAIL TALO SIG, an  
individual, ALEA TALO SIG, an  
individual, BRYZ TALO SIG, an  
individual, MAURICE TALO SIG, an  
individual, MIKAELLA TALO SIG, an  
individual, ALEXANDER TAN, an  
individual, ANDRE TAN, an  
individual, GENEVIEVE TAN, an  
individual, KARLEE TAN, an  
individual, JOHN TAVOLIERI, an  
individual, TERESA TAVOLIERI, an  
individual, ELLIE TERRANOVA, an  
individual, JOSEPH TERRANOVA, an  
individual, KAITLYN TERRANOVA,  
an individual, MATTHEW  
TERRANOVA, an individual.

CASE NO.

**DECLARATION OF STEVEN J.  
CASSULO IN SUPPORT OF  
DEFENDANTS' NOTICE OF  
REMOVAL**

1 MICHELLE TERRANOVA, an  
individual, JOHN TITUS CLEMONS,  
2 an individual, MARILLELY  
TOCHIHUITL BUENO, an individual,  
3 BADROLMLOUK TOFANGDAR,  
an individual, WILLIAM TORRES, an  
4 individual, ASHTON TRACY, an  
individual, HUNTER TRACY, an  
5 individual, OLIVE TRACY, an  
individual, SETH TRACY, an  
6 individual, ALMA TREJO, an  
individual, FELIPE TREJO, an  
7 individual, TIM TROTTER, an  
individual, JANET LEE TROTTER, an  
8 individual, CERMA TRINIDAD, an  
individual, JOSE TRINIDAD FLETES,  
9 an individual, LAURA TUREK, an  
individual, MADYSYN TUREK, an  
10 individual, MAKAILYN TUREK, an  
individual, MASON TUREK, an  
11 individual, ANNABELLE TURLA, an  
individual, ROMUALDO TURLA, an  
12 individual, NATALIE TUTTLE, an  
individual, WANDA TUTTLE, an  
13 individual, BARRETT TYRRELL, an  
individual, BRANDON TYRRELL, an  
14 individual, KAYLA TYRRELL, an  
individual, MARIE JOSEPHINE  
15 UMALI, an individual, JOSHUA  
URIEL OCHOA, an individual,  
16 STEPHEN VALENZUELA, an  
individual, MARTHA VANEGAS, an  
17 individual, KASSIDY VARGAS, an  
individual, ZENEN VARGAS, an  
18 individual, OSCAR VASQUEZ  
RAMIREZ, an individual, LUIS  
19 VEGA, an individual, LUCAS  
VENTURA, an individual, NORLAND  
20 VENTURA, an individual, ODETH  
ARIANNA VENTURA, an individual,  
21 DAVID VERDIN, an individual,  
GREGORY VIVIT, an individual,  
22 MARCELINA VIVIT, an individual,  
DANIELLE VILLEGAS, an individual,  
23 JOHN VILLEGAS, an individual,  
JULIA VILLEGAS, an individual,  
24 PAM VILLEGAS, an individual,  
PETER VILLEGAS, an individual,  
25 NICHOLAS VINCELLI, an individual,  
HEATHER VITALE-RASHTIAN, an  
26 individual, MORIAH VORGITCH, an  
individual, STEVEN VORGITCH, an  
27 individual, WINONA VORGITCH, an  
individual, BLAKE WALZ, an  
28 individual, CALEB WANG, an

1 individual, ELIANA WANG, an  
individual, ELIZABETH WANG, an  
2 individual, TIMON WANG, an  
individual, TOBIAS WANG, an  
3 individual, AARON WARNER, an  
individual, SAMUEL WARNER, an  
4 individual, CATHERINE  
WEBERHUSCHITT, an individual,  
5 CHARLES WELDON, an individual,  
LISA WELDON, an individual,  
6 VIRGIL WEVER, an individual,  
ANABELLE WEXLER, an individual,  
7 DAVID WHEATON, an individual,  
LILY WHEATON, an individual, JOE  
8 WHEELER, an individual, ASHTON  
WHITAKER, an individual,  
9 CHRISTIAN WHITAKER, an  
individual, DASH WHITAKER, an  
10 individual, JULIE WHITAKER, an  
individual, WILLIAM WHITAKER, an  
11 individual, FAIDH WILSON, an  
individual, BRITNEY WILSON, an  
12 individual, JEANNE WILSON, an  
individual, PAUL WILSON, an  
13 individual, GRACE WILSON  
CABRERA, an individual, DIVYA  
14 WISHARD, an individual, AMANDA  
WIRT, an individual, RUSSELL  
15 WOLFF, an individual, AUSTIN  
WOLFF, an individual, MADELINE  
16 WOLFF, an individual, WAYLON  
WOLFF, an individual, WAFE  
17 WOLFF, an individual, MIRANDA  
WOLFF, an individual, DAVE  
18 WRIGHT, an individual, HYUNSIK  
YOON, an individual, JOSHUA  
19 YOON, an individual, RYAN YOON,  
an individual, ACE YZRAEL  
20 FRANCO, an individual, ANDREW  
ZARAKOWSKI, an individual,  
21 CORRIE ZARAKOWSKI, an  
individual, EMILY ZARAKOWSKI, an  
22 individual, BETHANIE ZAZUETA, an  
individual, LAINIE ZAZUETA, an  
23 individual, SCOTT ZAZUETA, an  
individual, PAULA ZEPEDA, an  
24 individual, DENA ZINGELEWICZ, an  
individual, PHILLIP ZINGELEWICZ,  
25 an individual, KRISTOPHER  
LINCOLN, an individual. JOANN C.  
26 LOPEZ, an individual, WILLIAM  
KINSLEY, an individual, SHANE  
27 KINSLEY, an individual, SUSAN  
SARRASIN, an individual, JONA  
28 STOCKER, an individual. GREGORY

1 JONATHAN STOCKER, an individual,  
MICHAEL SCHEKER, an individual,  
2 EVELINA GRIGORIAN, an individual,  
ANDREW SCHEKER, an individual,  
3 BRENDA GOMEZ, an individual,  
JOSE FIGUERA, an individual,  
4 MARCELA FIGUERA, an individual,  
CAMILA NAVARRO, an individual,  
5 ALAN DAVID, an individual, TINA  
DAVID, an individual, VINCENT  
6 DAVID, an individual, GABRIELLA  
DAVID, an individual, DOMINICK  
7 DAVID, an individual,

8 Plaintiffs,

9 vs.

10 CHIQUITA CANYON, LLC, a  
Delaware Limited Liability Company;  
11 CHIQUITA CANYON, INC., a  
Delaware Corporation; WASTE  
12 CONNECTIONS US, INC., a Delaware  
Corporation; and DOES 1-150,  
13 inclusive,

14 Defendants.



**DECLARATION OF STEVEN J. CASSULO**

I, Steven J. Cassulo, declare as follows:

1. I am the District Manager of the Chiquita Canyon Landfill (the “Landfill”), which is owned and operated by Chiquita Canyon, LLC (“Chiquita”), a party in the above-entitled action. I have personal knowledge of the facts set forth herein, which are known by me to be true and correct, and if called as a witness, I could and would competently testify thereto. Because this declaration is made for a limited purpose, it does not purport to set forth all of my knowledge about the facts contained herein.

2. I am an employee of Chiquita. My responsibilities at Chiquita include management of day-to-day operations of the Landfill, representation of the Landfill before State and local agencies, ensuring regulatory compliance, and oversight of performance metrics.

3. Based on my work, I am personally familiar with the corporate structure of Chiquita and its related entities. Chiquita is a Delaware limited liability corporation, with a principal place of business in The Woodlands, Texas. Chiquita is wholly owned by Chiquita Canyon, Inc., a Delaware corporation with a principal place of business in The Woodlands, Texas. Chiquita Canyon, Inc. is itself wholly owned by Waste Connections US, Inc. Waste Connections US, Inc. is incorporated in Delaware with its principal place of business located in The Woodlands, Texas. Waste Connections US, Inc. is in turn, wholly owned by Waste Connections, Inc., Chiquita’s ultimate parent. Waste Connections, Inc. is an Ontario, Canada corporation with a principal place of business in The Woodlands, Texas.

4. The Landfill is a 639-acre municipal solid waste landfill located in Los Angeles County that has been in operation since 1974. I am informed and on that basis believe, that from 1974 to 1987, the Landfill was owned by Chiquita Canyon Landfill Company. Operation of the Landfill was transferred to Laidlaw Waste Systems, Inc., in 1987, Allied Waste Services, Inc., in 1996, and USA Waste

1 Services Company in 1997. In January 1999, Republic Services acquired the  
2 Landfill from US Waste Services Company. None of these companies have any  
3 corporate relationship to Chiquita or any of its parent companies. In 2009, Chiquita  
4 Canyon, Inc. acquired the membership interests of Chiquita (f/k/a Republic Services  
5 of California I, LLC) from Republic Services.

6 5. Chiquita holds all the permits for the Landfill. No other entity holds  
7 the permits for the Landfill. All Notices of Violation ("NOVs") received by the  
8 Landfill from the South Coast Air Quality Management District referenced in the  
9 Complaint have been addressed solely to Chiquita or the Landfill. Attached as  
10 **Exhibit A** is a sampling of such NOVs.

11 6. I am not aware of any involvement by WC-California, Inc. with any  
12 Landfill management, ownership, operations or decision-making.

13 7. Chiquita is not financially dependent on WC-California. WC-  
14 California does not pay any expenses or losses of Chiquita.

15 8. Chiquita pays state and federal taxes as required and has its own federal  
16 EIN.

17 I declare under penalty of perjury under the laws of the State of California  
18 that the foregoing is true and correct.

19 Executed April 22, 2024, at Castaic, California.

20  
21   
22 Steven J. Cassulo

# EXHIBIT A





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

ID #: 109

P 78426

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month: 11	Day: 06	Year: 23

Facility Name: CHIVITA CANYON LLC		Facility ID#: 119219	Sector: VB
Location Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384
Mailing Address: 29201 HENRY MAYO DRIVE		City: CASTAIC	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance, or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			" "
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: 661 371 9214	Served By: Arelly Gil Rojas	Date Notice Served:
Title: District Manager	Email: Steve.Cassulo@wastecollections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2183 <input type="checkbox"/> 310-233-	Email: arajas@aqmd.gov

\*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District  
CCR – California Code of Regulations

CH&SC – California Health and Safety Code  
CFR – Code of Federal Regulations

Method of Service:

☒ In Person☐ Certified Mail





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

ID# 110

P 79252

# NOTICE OF VIOLATION

## DATE OF VIOLATION

Month: 11	Day: 16	Year: 23
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Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr.		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				

Served To: Steve Cassulo	Phone: 661-371-9214	Served By: Heidee dela Cruz	Date Notice Served: 11/16/23
Title: District Manager	Email: Steven.cassulo@wastecconnection.com	Phone No: <input checked="" type="checkbox"/> 909-396-2176 <input type="checkbox"/> 310-233-	Email: hdelacruz@aqmd.gov

\*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District  
CCR – California Code of Regulations

CH&SC – California Health and Safety Code  
CFR – Code of Federal Regulations

Method of Service:

☒ In Person ☐ Certified Mail

VIOLATOR'S COPY





South Coast Air Quality Management District  
21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178

ID # 111

P 75990

# NOTICE OF VIOLATION

DATE OF VIOLATION		
Month:	Day:	Year:
11	29	23

Facility Name: Chiquita Canyon Landfill		Facility ID#: 119219	Sector: VB
Location Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384
Mailing Address: 29201 Henry Mayo Dr		City: Castaic	Zip: 91384

YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.

EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.

## DESCRIPTION OF VIOLATIONS

#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	Rule 402		_____	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	CH 4175 41700		_____	For discharging such quantities of air contaminants to cause injury, detriment, nuisance or annoyance to a considerable number of persons.
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR			_____	

Served To: Steve Cassula	Phone: 616-371-9214	Served By: Daniel Woo	Date Notice Served: 11/29/23
Title: District Manager	Email: steveca@wasteconnections.com	Phone No: <input checked="" type="checkbox"/> 909-396-2433 <input type="checkbox"/> 310-233-	Email: DWoo@aqmd.gov

\*Key to Authority Abbreviations:

SCAQMD – South Coast Air Quality Management District  
CCR – California Code of Regulations


CH&SC – California Health and Safety Code  
CFR – Code of Federal Regulations

Method of Service:

☒ In Person ☐ Certified Mail

VIOLATOR'S COPY



 <b>South Coast Air Quality Management District</b> 21865 COPLEY DRIVE, DIAMOND BAR, CA 91765-4178		<b>P 79408</b>			
<b>NOTICE OF VIOLATION</b>		DATE OF VIOLATION Month: 02 Day: 29 Year: 24			
Facility Name <b>CHIRQUITA CANYON LLC</b>		Facility ID <b>119219</b>	Section <b>VB</b>		
Location Address <b>29201 HENRY MAYO DRIVE</b>		City <b>CASTAIC</b>	Zip <b>91354</b>		
Mailing Address <b>29201 HENRY MAYO DRIVE</b>		City <b>CASTAIC</b>	Zip <b>91354</b>		
<p>YOU ARE HEREBY NOTIFIED THAT YOU HAVE BEEN CITED FOR ONE OR MORE VIOLATIONS OF THE SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT (SCAQMD) RULES, STATE LAW OR FEDERAL LAW. IF PROVEN, SUCH VIOLATION(S) MAY RESULT IN THE IMPOSITION OF CIVIL OR CRIMINAL PENALTIES.</p> <p>EACH DAY A VIOLATION OCCURS MAY BE HANDLED AS A SEPARATE OFFENSE REGARDLESS OF WHETHER OR NOT ADDITIONAL NOTICES OF VIOLATION ARE ISSUED.</p>					
<b>DESCRIPTION OF VIOLATIONS</b>					
#	Authority*	Code Section or Rule No.	SCAQMD Permit to Operate or CARB Registration No.	Condition No. (If Applicable)	Description of Violation
1	<input checked="" type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	402			Fire discharging such quantities of air contaminants to cause injury, nuisance or annoyance to a considerable number of persons
2	<input type="checkbox"/> SCAQMD <input checked="" type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR	41700			" "
3	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
4	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
5	<input type="checkbox"/> SCAQMD <input type="checkbox"/> CH&SC <input type="checkbox"/> CCR <input type="checkbox"/> CFR				
Served To: <b>STEVE CASSULO</b>		Phone: <b>661-371-9214</b>	Served By: <b>BILLY ANDRINO</b>	Date Notice Served: <b>02/29/24</b>	
Title: <b>DISTRICT MANAGER</b>		Email: <b>steve.cassulo@wastecconnections.com</b>	Phone No: <input checked="" type="checkbox"/> 809-396-2682 <input type="checkbox"/> 310-233-	Email: <b>bantoria</b> @ aqmd.gov	
*Key to Authority Abbreviations: SCAQMD - South Coast Air Quality Management District CH&SC - California Health and Safety Code CCR - California Code of Regulations CFR - Code of Federal Regulations			Method of Service: <input type="checkbox"/> In Person <input checked="" type="checkbox"/> Certified Mail		